StarKist Samoa, Inc.

A Division of Star-Kist Foods, Inc.
P.O. Box 368
Pago Pago, Tutuila Island
American Samoa 96799
Telephone 684 644-4231
Facsimile 684 644-2440

June 21, 2005

Mr. Carl L. Goldstein
US EPA Region 9
Pacific Insular Area Program {CMD-5}
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Goldstein:

This letter is a follow up letter from the Ocean Dumping Permit flow violations that occurred in May 2005.

The captain of the Blue Moon Dick Mikkelson reported that they were experiencing pump flow control problems during the month of May and this was the cause of the flow violations. He stated that the problems have been fixed.

However, we have also learned that the Flow meters to monitor discharge rate are not functioning. We have addressed both issues with Blue North fisheries president Mike F. Burns. Please, see attached letter to Blue North Fisheries.

If you have any questions or need further information please don't hesitate to contact me at 684-644-4249 or 684-258-3234
Thank you.

Sincerely,
Lance E. Ihaka

Manager
Engineering Department
StarKist Samoa, Inc.

cc: Mr. Peter Peshut, ASEPA Technical Service Program Manager
Mr. Tim Ruby, Del Monte Environmental Water Manager

StarKist Samoa, Inc.

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June 27, 2005

Michael F. Burns, President
Blue North Fisheries
2930 Westlake Avenue North
Suite 300
Seattle, Washington 98109

SUBJECT: Proper Ocean Management of Plant Fish Processing Wastes
StarKist Samoa, Inc., Pago Pago, American Samoa

Dear Mr. Burns:

We are writing to inform you that yet again fish processing wastes generated by our plant were not properly discharged at the ocean dumping site by your disposal vessel during the month of May 2005.

As provided below, ocean dumping logs filed with us by Captain Mikkelson of your firm indicate that the disposal site maximum permitted flow rate of 120 gallons/min/knts was exceeded on five separate days during the month of May 2005.

Discharge Date	Calculated Discharge Rate (gallons/min/knts)
5/5/06	137
5/6/05	124
5/19/05	124
5/20/05	129
5/26/05	128

This situation is very disappointing to us since this is the second time that this has happened in the past five months. If you recall, we discussed this very same matter in December of last year and at that time we were lead to believe that your firm had modified ship systems to ensure proper discharge rates.

Captain Mikkelson has informed us that the most recent discharge violations were caused by pump control problems. However, it is our understanding that you remain to install a functional flow meter for monitoring discharges as we requested back in December of last year.

We appreciate that equipment can malfunction but based on the above discharge data it appears that the pump control problems described by Captain Mikkelson lasted over the entire month of May before the necessary repairs were completed to bring discharge rates back into line which is unacceptable. Future discharge problems on the ship need to be correctly promptly because on-going permit violations could result in fines, more expensive monitoring and reporting being required by regulatory agencies, and/or our ocean dumping permit being revoked.

At this time, we request that the pump control problems described by Mr. Mikkleson be corrected as soon as possible and that the required flow metering equipment discussed previously be installed in the next 15 days. As confirmation that necessary repairs to systems have been completed, we request that you provide us with a written report in the next 30 days.

We hope that you appreciate our position in this matter and we look forward to a continuing good working relationship. If you have any questions or need clarification, please feel free to contact me at (684) 644-4249 x 362 or by cell at (694) 258-3234.

Sincerely,

STARKIST SAMOA, INC.

Lance Ihaka, Manager
Plant Engineering Department

cc: Tim Ruby, Del Monte – Walnut Creek, CA
Peter Peshut, ASEPA – American Samoa
Carl Goldstein, USEPA – San Francisco, CA

StarKist Seafood, Inc.

P.O. Box 368
Pago Pago, Tutuila Island
American Samoa 96799

Telephone: 684 633-1838
Facsimile: 684 633-2410

June 23, 2005

Mr. Carl L. Goldstein
US EPA Region 9
Pacific Insular Area Program (CMD-5)
75 Hawthorne Street
San Francisco, CA 94105

SUBJECT: Notification of Discharge Violations During May 2005
StarKist Samoa, Inc., Pago Pago, American Samoa
Ocean Dumping Permit No. OD 93-01

Dear Mr. Goldstein:

As required by Condition 3.3.4 of our Ocean Dumping Permit No. OD93-01, this is to notify you that ocean dumping logs filed with us this week by our disposal contractor indicate that our fishing wastes were not discharged at the disposal rate and vessel speeds specified by Condition 4.4.1.2 of our permit.

For the Month of May, 2005, during normal discharge on the vessel Blue Moon, the maximum permitted flow rate of 120 gallons/min/knts was slightly exceeded on five separate days with the following data:

Discharge Date	Calculated Discharge Rate (gallons/min/knts)
5/5/05	137
5/6/05	124
5/19/05	124
5/20/05	129
5/26/05	128

The daily disposal logs for the above mentioned dates along with the ocean monitoring test results that were conducted shortly after the last date above are attached for your review.

Please note that the attached ocean monitoring test results are very similar to past monitoring completed at the dump site. Further, during any of the subject discharge days, we were not altered of any beach wash up of our fish wastes and/or floatables. This is positive and indicates that the somewhat higher discharge rates had negligible impacts on receiving waters.

At this time, Dick Mikkelson who captained the Blue Moon on the subject discharge days is currently off island and unavailable to give us an explanation as to the causes and reasons surrounding the somewhat high discharges. Note that he will be back on island on July 10, 2005, and we will make contact with him at that time to gain further information and forward his report to you as a follow-up to this letter.

Be assured that we will continue to diligently work with our disposal contractor to ensure on-going compliance with all permit limitations and will take necessary corrective actions so this matter does not happen again.

If you have any questions or require additional information, please do not hesitate to contact me at (684) 644-2860 x 354.

Sincerely,

STARKIST SAMOA, INC.

Joe Carney
Utility Department Head

Att: Ocean Disposal Logs
Ocean Monitoring Test Results

cc: Mr. Peter Peshut, ASEPA Technical Service Program Manager
Mr. Tim Ruby, Del Monte Environmental Water Manager

STAR KIST SAMOA, INC
P. O. BOX 368, PAGO PAGO AMERICAN SAMOA 96799
WATER TREATMENT DEPARTMENT

REPORT OF ANALYSES RESULTS

SAMPLE TYPE : Sea Water - Ocean Monitoring Sampling - June 09, 2005
REPORTING DATE : June 23, 2005

SAMPLES	AMMONIA (mg N/L)	TOTAL NITROGEN (mg N/L)	TOTAL PHOSPHORUS (mg P/L)	NON FILTERABLE RESIDUE (mg/L)	VOLATILE NON FILTERABLE RESIDUE (mg/L)	OIL& GREASE (mg / L)
Stn : 1-1Mtr Control	0.021	0.1	0.035	4.0	1.5	0.60
Stn : 1-3 Mtr Control	0.014	0.0	0.030	4.0	1.5	0.36
Stn :1-10 Mtr Control	0.014	0.5	0.020	5.0	2.0	0.60
Stn : 1-1Mtr	0.035	0.2	0.025	6.0	2.0	0.36
Stn : 1-3 Mtr	0.031	0.0	0.030	4.5	2.0	0.37
Stn : 1-10 Mtr	0.035	0.0	0.020	4.5	1.5	0.37
Stn : 2-1 Mtr	0.039	0.0	0.015	3.5	1.0	0.70
Stn : 2-3 Mtr	0.033	0.5	0.030	5.5	2.0	0.35
Stn : 2-10 Mtr	0.030	0.5	0.030	5.0	2.0	0.48
Stn : 3-1 Mtr	0.039	0.0	0.015	5.5	2.0	0.35
Stn : 3-3 Mtr	0.035	0.0	0.025	6.0	2.0	0.58
Stn : 3-10 Mtr	0.047	0.1	0.015	4.5	1.5	0.81
Stn : 4-1 Mtr	0.049	0.2	0.025	4.0	1.5	0.23
Stn : 4-3 Mtr	0.054	0.1	0.030	6.0	2.0	0.36
Stn : 4-10 Mtr	0.045	0.0	0.015	5.5	2.0	0.71
Stn : 5-1 Mtr	0.054	0.0	0.010	5.5	2.0	0.28
Stn : 5-3 Mtr	0.060	0.1	0.015	5.0	2.0	0.47
Stn : 5-10 Mtr	0.040	0.0	0.020	4.5	2.0	0.71

Joe Carney: Department Head

COS SAMOA PACKING

COMPANY

January 19, 2006

Mr. Peter Peshut
American Samoa Environmental
Protection Agency
American Samoa Government
Pago Pago, American Samoa 96799

RE: **OCEAN DUMPING PERMIT OD-93-02 SPECIAL.**

Dear Sir,

Further to Mr. Kevin Murphy's telephone conversation with Peter Peshut on Thursday January 19, 2006. COS Samoa Packing is reporting the following variance to the above Ocean Dumping Permit.

Note: Samples analyzed after hold time had expired.

DATE	ANALYTE	EFFLUENT	PERMIT
12/07/06	Total Solids	61,800 mg/L	54,590 mg/L

Sincerely Yours,

COS SAMOA PACKING COMPANY

1/19/06

Herman Gebauer
General Manager

cc: Mr. C. Goldstein (USEPA)
B. Ransby
File/E-7000

P.O. Box 957 Pago Pago, American Samoa 96799
Phone: (684) 644-5272 Fax: (684) 644-2290

To: Carl Goldstein, USEPA

From: Steve Costa, CH2M HILL

Copy: Peter Peshut, ASEPA
StarKist Samoa (Brett Butler, Tim Ruby, Joe Carney, Theresa Carney)
COS Samoa Packing (Herman Gebauer, Jim Cox, Brett Ransby)

Date: 31 January 2006

Requested Changes to Permit Required Sampling for

StarKist Samoa NPDES Permit No.AS0000019

COS Samoa Packing NPDES Permit No. AS0000027

StarKist Samoa and COS Samoa Packing are requesting that USEPA allow a modified sampling program for effluent metals sampling and the Receiving Water Monitoring Program during the period before renewal permits are issued. The requested revisions, and justification for such revisions, have been previously discussed with USEPA and ASEPA. These revisions were also discussed in the transmittal provided with the permit renewal applications for each of the canneries. The proposed revisions will not compromise the ability of USEPA and ASEPA to assess compliance with permit limitations and the American Samoa Water Quality Standards (ASWQS)

Permit Section A. Effluent Limits and Monitoring Requirements

The canneries propose to replace the once per month sampling frequency and the composite sample for copper and zinc with a semiannual sampling frequency with 8 grab samples spaced three hours apart for copper, zinc, and mercury. The samples will be collected simultaneously with the individual grab samples collected for the semiannual toxicity testing. All other requirements of Section A will remain the same.

The canneries have been collecting monthly samples for copper and zinc for the past five years. There is a sufficient amount of data to characterize the long term concentrations of these parameters in the effluent. Analysis of grab samples over 24-hour periods will provide information on the short term variability.

Mercury has been detected in the effluent of both canneries at concentrations above the proposed new ASWQS during recent priority pollutant scans. Additional information on mercury will be required to define a mixing zone. Sampling concurrently with the copper and zinc sampling is convenient and cost effective. Without mercury sampling there will be no additional effluent mercury data until a new permit is issued.

Permit Section E. Receiving Water Quality Monitoring Program

Receiving water quality monitoring over the past five years, and even prior to that time, has provided sufficient data to characterize and describe the water quality of the receiving water body (Pago Pago Harbor). During that time no effect of the canneries discharge has been observed, and water quality criteria and standards for the measured parameters have generally been achieved. On the rare occasions when water quality standards were not met

the cause was not attributable to the canneries' discharge and was attributed to natural causes. Future monitoring can be significantly reduced without compromising the evaluation of permit limitations or the ASWQS.

The canneries request a reduction in number of monitoring stations. It is proposed that Stations 11, 15, and 18, as shown in Table 1, not be sampled for any parameters. It is noted that Station 11 is well away from the discharge and the approved mixing zones, and is generally for informational purposes only. Stations 15 and 18 are at the edge of the nutrient mixing zone. However, the permit limitations at the edge of the mixing zone are consistently met and the TN and TP concentrations at these stations are typically indistinguishable from background. Compliance can be demonstrated by TN and TP measurements at Stations 8 and 8A, which are both well within the nutrient mixing zone. If ASWQS for TN and TP are met within the mixing zone, the permit limitations at the edge of the mixing zone are undoubtedly achieved, and Stations 15 and 18 are redundant.

Table 1. Requested Reduction in Sampling Stations

Existing Monitoring Stations	Vicinity	Location	Proposed Monitoring Stations
5	Transition Zone	Harbor Mouth	5
8	Middle Harbor	Inside ZOM	8
8A	Middle Harbor	Inside ZOM	8A
11	Inner Harbor	East End	
13	Inner Harbor	West End	13
14	Middle Harbor	Diffuser	14
15	Middle Harbor	ZOM Edge	
16	Middle Harbor	ZOM Edge	16
18	Outer Harbor	ZOM Edge	

The canneries further request that the number of parameters monitored at the remaining stations be reduced as shown in Table 2. The the justifications for individual parameters are as follows:

- The receiving water is full strength sea water at all stations with only brief and minor depressions in salinity in near surface water after heavy rain. The measurement of pH provides little useful information because the buffering action of seawater controls the pH within a narrow range. Five years of data have shown that pH is typically consistent with that of seawater and does not vary by more than 0.2 units from the long term average. The accuracy of the measurement is on the same order as the observed variation.
- Turbidity, light penetration (by Secchi depth), suspended solids, and, to a large extent, chlorophyll-a, are all used to characterize water clarity, which is important for coral reef health. The canneries are proposing to replace these measurements with a vertical profile of photosynthetically available radiation (PAR). Such a measurement would provide direct information on light extinction (water clarity).

The data would be collected throughout the entire water column, which is a distinct improvement over existing methods. Finally, such a measurement is directly applicable to assessing the light penetration criterion in the ASWQS, which is not achieved using any of the other parameters.

- Total nitrogen (TN) and total phosphorous (TP) monitoring at stations 5, 13, and 14 does not add significantly to the assessment of the effect of the canneries' discharge and are not necessary to evaluate compliance with permit limitations. The past five years of data clearly indicate overall compliance, and continued monitoring at only the three stations requested (8, 8A, and 18) is sufficient to assess compliance.
- Monitoring for lead and arsenic has been for informational purposes and these parameters do not have permit limitations. The past five years of data indicate compliance with ASWQS. Additional monitoring of these parameters is not required for permit monitoring.

With the exceptions noted above, all other requirements of Section E will remain the same. It is noted that sampling will be continued at three depths at each of the stations listed above.

Table 2. Requested Reduction in Sampling Parameters

("X" indicates monitored parameter)

Parameter	Measurement Type	Existing Parameters Measured at Stations						Proposed Parameters Measured at Stations					
		5	8	8A	13	14	16	5	8	8A	13	14	16
Temperature	Vertical Profile	X	X	X	X	X	X	X	X	X	X	X	X
Salinity	Vertical Profile	X	X	X	X	X	X	X	X	X	X	X	X
pH	Vertical Profile	X	X	X	X	X	X						
Dissolved Oxygen	Vertical Profile	X	X	X	X	X	X	X	X	X	X	X	X
Turbidity	Vertical Profile	X	X	X	X	X	X						
Turbidity	Grab					X	X						
Light Penetration	Direct Reading	X	X	X	X	X	X						
Light Extinction	PAR Profile							X	X	X	X	X	X
Suspended Solids	Grab	X	X	X	X	X	X						
Chlorophyll-a	Grab	X	X	X	X	X	X						
Total Ammonia	Grab	X	X	X	X	X	X	X	X	X	X	X	X
Total Nitrogen	Grab	X	X	X	X	X	X		X	X			X
Total Phosphorous	Grab	X	X	X	X	X	X		X	X			X
Copper	Grab	X	X	X	X	X		X	X	X	X	X	X
Zinc	Grab	X	X	X	X	X		X	X	X	X	X	X
Lead	Grab	X			X	X							
Mercury	Grab	X			X	X		X	X	X	X	X	X
Arsenic	Grab	X			X	X							